

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Alexandra Avchukov, Quentin Chappat,
Sandra Maesta Pereira, Kris Iyer,
Anthony Palie, Dakota Bedell, Carl Corbo,
Annabel Gould, Dolores Thompson, Bridgette
Winkelmann, Billy Ting, Duoc Vo, Garry
Huang, Jeffrey Wang, Joshua Chin,
- and - Willy Ngo
*on behalf of themselves and
all others similarly situated,*
Plaintiffs

v.

Avant Gardner, LLC, AGDP Holdings, Inc.,
EZ Festivals, LLC,
Made Event, LLC, -and- Jurgen Bildstein
Defendants

Case No. 1:23-CV-8106-MMG-JW

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTION TO STRIKE OR DISMISS
AVCHUKOV AMENDED COMPLAINT**

Plaintiffs ("Plaintiffs") and Defendants ("Defendants") in the above-captioned action, by and through their respective counsel of record, hereby stipulate and agree to set a briefing schedule for Defendants' noticed Motion to Strike, or in the Alternative, To Dismiss Certain Defendants and Counts of the Avchukov Amended Complaint ("Motion") (ECF No. 65), as follows:

WHEREAS, Plaintiffs commenced three separate putative class actions against one or more of the Defendants between September 16 and October 5, 2023.

WHEREAS, on December 26, 2023, Plaintiffs filed a Consolidated Class Action Complaint against all Defendants except AGDP, Holdings, Inc., naming Alexandra Avchukov as principal lead plaintiff ("Avchukov Consolidated Complaint"). (ECF No. 26.)

WHEREAS, on March 21, 2024, Defendants filed a motion to dismiss the Avchukov Consolidated Complaint ("Original Motion"). (ECF Nos. 49-51.)

WHEREAS, on April 4, 2024, in response to Defendants' Original Motion, Plaintiffs filed an Amended Consolidated Class Action Complaint ("Avchukov Amended Complaint"), which, among other things, added AGDP, Holdings, Inc. as an additional Defendant. (ECF No. 62.)

WHEREAS, on April 18, 2024, Defendants filed the Motion, which seeks to strike the Avchukov Amended Complaint, or, in the alternative, to dismiss certain defendants and counts from the Avchukov Amended Complaint. (ECF Nos. 65-67.)


NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for Plaintiffs and Defendants, subject to the approval of the Court, that:

1. Plaintiffs shall file their opposition to the Motion by May 20, 2024.
2. Defendants shall file their reply with respect to the Motion by June 7, 2024.

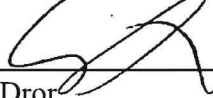
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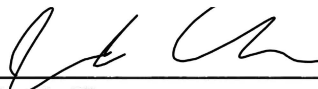
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IT IS SO ORDERED.

Dated: _____, 2024

HONORABLE MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE